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Via ECF

August 8, 2025

Hon. J. Paul Oetken
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Trinidad v. Sensio, Inc.
Docket No. 1:23-cv-7085

Dear Judge Oetken:

Pursuant to Rule 2.D. of Your Honor's Individual Rules and Practices in Civil Cases, the parties jointly request a thirty-day adjournment of the deadline to submit a Joint Pre-trial Order. Earlier today, the Court directed the parties to "contact Judge Lehrburger's chambers promptly to schedule a further settlement conference." D.E. 55. At the time Your Honor's Order was issued, the parties had already confirmed with Judge Lehrburger's chambers that they would appear for a virtual mediation on September 30, 2025. That date has been confirmed by all parties.

Therefore, we jointly request an extension of the deadline to file a pre-trial order to **October 31, 2025**, so that we may conserve resources while preparing to resolve this matter, if possible. This is the first request for an extension of the pre-trial order deadline. The only other deadline(s) that are affected by this request are the dates for a potential trial. In that regard, the parties propose that they confer on possible trial dates in December 2025 to May 2026 if this matter is not resolved before Judge Lehrburger.

We thank the Court for its time and consideration of this matter.

Respectfully,

JOHNSON BECKER PLLC

COLELLA ZEFUTIE LLC

s/ Adam J. Kress

Adam J. Kress (admitted pro hac vice)
Attorneys for Plaintiff
Victoria Trinidad

s/ John J. Zefutie, Jr.

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Sensio, Inc.

cc: All Counsel of Record (via ECF)